

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

HB STRATEGIES LLC

Plaintiff	Case Number
vs.	1:24-cv-9052
THE BOLIVARIAN REPUBLIC OF VENEZUELA	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

VGB LIMITED

Plaintiff	Case Number
vs.	1:23-cv-09933-AT
THE BOLIVARIAN REPUBLIC OF VENEZUELA	
Defendant	

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

The complaint in VGB Limited was filed on November 9, 2023, and on November 14, 2023, the case was accepted as related to Neuhauser v. Bolivarian Republic of Venezuela, 1:20-cv-10342-AT. On February 2, 2024, the Court granted plaintiff's letter motion related to effectuating service of process pursuant to 28 U.S.C. § 1608(a). It is unclear from the docket whether service has been effectuated.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

These cases are both breach of contract actions against the Bolivarian Republic of Venezuela involving the nonpayment on notes issued by the Bolivarian Republic of Venezuela. These two actions involve common issues of fact and law regarding Venezuela's defenses to enforcement of the debt. Hearing these cases together is necessary to avoid conflicting orders regarding the enforceability of Venezuela's debt and to avoid a substantial duplication of effort and expense, delay, or undue burden on the Court, parties, and witnesses.

Signature: /s/ Matthew D. McGill

Date: 11/26/2024

Gibson, Dunn & Crutcher LLP

Firm: _____